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January 20, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Statement
CC Docket 99-200

Dear Ms. Salas:

On Wednesday, January 19, 2000, Gil Orozco, Bill Adair and I met with Chuck Keller, Chief, Network Services Division, Diane Harmon, Associate Chief, Network Services Division, Jeannie Grimes, Les Selzer, Tejal Mehta and Aaron Goldberger of the Network Services Division, and John Spencer, Wireless Telecommunications Division.

The purpose of the meeting was to discuss the issues set forth in the attachment hereto.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jim Smith".

Jim Smith
Director - Federal Regulatory

Attachment

cc: C. Keller
D. Harmon
L. Selzer
T. Mehta
A. Goldberger
J. Grimes
J. Spencer

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Number Conservation

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Unassigned Number Porting (UNP)

- UNP is defined as:
 - A telephone number (TN) administration/assignment process where available TNs in one service provider's (SP) inventory are ported, using the Location Routing Number (LRN) method, to another SP to meet a specific customer's request for service. This TN assignment is performed under the direction of a neutral third-party coordinator
 - UNP differs from thousand block number pooling (TBNP) in that TNs are not donated to a pool, but are transferred directly from one SP to another SP under the direction of a neutral third-party coordinator
 - UNP is not a number conservation measure

UNP Should Not Be Ordered Because...

- Deploying TBNP should be primary industry focus for the next several years
- UNP conflicts with state commissions requiring sequential block assignments which avoids unnecessary block contamination
- The number administrative issues with UNP are substantial
- UNP will promote inefficient use of numbering resources
 - Quality of utilization and forecast reporting will be compromised
 - Potentially creates demand for additional NXXs

Keep Industry Focused on the Deploying TBNP

- Implementation of the national TBNP standard should be industry's first priority
- Once implementation is complete, the industry, NANPA and the Commission should:
 - Evaluate impacts of TBNP on the NPAC and LRN network and supporting OSSs before consideration of new “trials”
 - Evaluate TBNP impacts on NPA and NANP exhaust projections

UNP Is...

- Promoted by CLECs as a competitive issue, not a number conservation measure
 - “UNP...is not a conservation mechanism...” MCIW quote from a presentation to the Texas Number Conservation Implementation Team in April 1999
- Number administration, therefore, requires a neutral third party to manage
- Not feasible with the deployment of TBNP
 - SPs are only permitted a 6-9 month inventory of numbers -- Everything else is donated to the rate center pools
 - The impact of porting unassigned numbers from providers inventories is significant
- Costly because it will require significant network, OSS and administrative changes